

# Exhibit 2

## Declaration of Scott Huss

1 **HAYES | WAKAYAMA**  
2 DALE A. HAYES, JR., ESQ.  
3 Nevada Bar No. 9056  
4 LIANE K. WAKAYAMA, ESQ.  
5 Nevada Bar No. 11313  
6 4735 S. Durango Drive, Ste. 105  
7 Las Vegas, Nevada 89147  
8 (702) 656-0808 – Telephone  
9 (702) 655-1047 – Facsimile  
10 dhayes@hwlawNV.com  
11 lkw@hwlawNV.com  
12 *Attorneys for Defendant Scott Huss*

13  
14 **UNITED STATES DISTRICT COURT**  
15 **DISTRICT OF NEVADA**

16 INTERNATIONAL MARKETS LIVE INC.,  
17 dba iMARKETSLIVE,

18 Case Number:  
19 2:20-cv-00866-JAD-BNW

20 Plaintiff,

21 vs.  
22 SCOTT HUSS, an individual,

23 Defendant.

24  
25 **DECLARATION OF SCOTT HUSS IN**  
**SUPPORT OF DEFENDANT'S**  
**MOTION TO DISMISS OR, IN THE**  
**ALTERNATIVE, MOTION TO**  
**TRANSFER VENUE**

26 **DECLARATION OF SCOTT HUSS IN SUPPORT OF DEFENDANT'S MOTION TO**  
**DISMISS OR, IN THE ALTERNATIVE, MOTION TO TRANSFER VENUE**

27 I, SCOTT HUSS, declare and state as follows:

28 1. I am over 18 years of age and have personal knowledge of the following facts  
29 and would, if called, testify as follows:

30 2. I am a resident of Miami, Florida, and I am domiciled in Miami.  
31 3. I have never lived in Nevada.  
32 4. I have no family that lives in Nevada.  
33 5. I do not own any investment properties or business interests in Nevada.  
34 6. I have never entered into any contracts with anyone in Nevada.  
35 7. I have never conducted any business in Nevada.  
36 8. I have never sent anything or anyone to do business in Nevada.

9. I have never communicated with an office of the Plaintiff in Nevada or conducted any business contracts with Plaintiff in Nevada.

Pursuant to NRS 53.045, I declare under penalty of perjury under the laws of the State of Nevada that the foregoing is true and correct, except for those facts stated upon information and belief, which I believe to be true.

Dated this 15 day of June, 2020.

By Scott Huss  
SCOTT HUSS